

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NORTHERN DIVISION

IN RE:) **CHAPTER 13**
)
ERIC M. WASHINGTON) **CASE NO. 12-73756-MGD**
QUEEN S. WASHINGTON)
)
DEBTOR(S))

NOTICE OF FILING OF MODIFICATION OF CONFIRMED PLAN, DEADLINE FOR
FILING WRITTEN OBJECTIONS AND HEARING DATE AND TIME IF OBJECTION
IS TIMELY FILED

To: Creditors and Other Parties of Interest

PLEASE TAKE NOTICE that the Debtors have filed and served you on a proposed modification of the confirmed plan in this case. Pursuant to Rule 3015(g) of the Federal Rules of Bankruptcy Procedure, any creditor or other party in interest opposing this proposed Modification must file that objection in writing with the Court on or before the following deadline:

DEADLINE FOR FILING OBJECTION: Twenty-four (24): days after the date of service of this proposed Modification, which date of service is 03/28/2016; if the twenty-fourth day after the date of service falls on a week-end or holiday, the deadline is extended to the next business day.

PLACE OF FILING:

Clerk, United States Bankruptcy Court
Room 1340 United States Courthouse
Richard Russell Building
75 Ted Turner Dr., S.W.
Atlanta, GA 30303-3367

If you mail an objection to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

You must also serve a copy on the undersigned at the address stated below and on the Debtors at 3408 Lanier Lane, Conyers, GA 30013.

PLEASE TAKE FURTHER NOTICE that if an objection to the proposed Modification is timely filed, the Court will hold a hearing on the modification on **4/27/2016 at 9:50 a.m. in Courtroom 1201**. If no objection is timely filed, the proposed Modification will be effective pursuant to 11 U.S.C. §1329(b)(2) as part of the Confirmed Plan without further notice or hearing.

Dated: March 28, 2016

Wood & Wood, LLP

Maureen E. Wood /S

Maureen E. Wood, Attorney for Debtors
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POST-CONFIRMATION MODIFICATION OF PLAN AND REQUEST FOR ITS APPROVAL

The above mentioned Debtors propose to modify the confirmed plan of reorganization as set forth below and request that this modification be approved.

Modification of Plan

Debtors hereby modify the Chapter 13 Plan, which the Court confirmed on 03/20/2013 as follows:

Debtor **deletes** the following highlighted step plan:

2. Plan Payments and Length of Plan. Debtor will pay the sum of **\$ 600.00 per month** to Trustee by **X Payroll Deduction(s)** or by Direct Payment(s) for the applicable commitment period of **60** months, unless all allowed claims in every class, other than long-term claims, are paid in full in a shorter period of time. The term of this Plan shall not exceed sixty (60) months. See 11 U.S.C. §§ 1325(b)(1)(B) and 1325(b)(4). Each pre-confirmation plan payment shall be reduced by any pre-confirmation adequate protection payment(s) made pursuant to Plan paragraph 6(A)(i) and § 1326(a)(1)(C).

The following alternative provision will apply if selected:

X IF CHECKED,

Plan payments will increase by \$ 204.06 on July 1, 2014 upon completion or termination of Debtor's 401k loan 2

Plan payments will increase by \$ 53.86 on September 1, 2014 upon completion or termination of Debtor's SP Loan 3

Plan payments will increase by \$ 124.70 on September 1, 2015 upon completion or termination of Debtor's 401k loan 1

Plan payments will increase by \$ 141.61 on December 1, 2015 upon completion or termination of Debtor's SP Loan 2

Plan payments will increase by \$ 17.01 on July 1, 2016 upon completion or termination of Debtor's 401k loan 3

Debtors **insert** the following paragraph:

2. Plan Payments and Length of Plan. Debtor will pay the sum of \$ **1,300.00** per **month** to Trustee by **X** Payroll Deduction(s) or by Direct Payment(s) for the applicable commitment period of **60** months, unless all allowed claims in every class, other than long-term claims, are paid in full in a shorter period of time. The term of this Plan shall not exceed sixty (60) months. See 11 U.S.C. §§ 1325(b)(1)(B) and 1325(b)(4). Each pre-confirmation plan payment shall be reduced by any pre-confirmation adequate protection payment(s) made pursuant to Plan paragraph 6(A)(i) and § 1326(a)(1)(C).

The following alternative provision will apply if selected:
IF CHECKED,

WHEREFORE, Debtors pray that this post-confirmation plan modification be allowed, and for such other and further relief as the Court deems appropriate and just.

Dated: March 28, 2014

Respectfully Submitted,

Wood & Wood, LLP

Maureen E. Wood /S

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DECLARATION UNDER PENALTY OF PERJURY

We declare under penalty of perjury that the foregoing is true and correct to the best of our knowledge, information and belief.

This March 28, 2014

Eric M. Washington /S

Queen S. Washington /S

Penalty for making a false statement or concealing property: fine up to \$500,000 or imprisonment for up to 5 years or both. 18 U.S.C. §152 and §3571.